

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Southern District of TexasUnited States Courts  
Southern District of Texas  
FILED**July 13, 2024**

Nathan Ochsner, Clerk of Court

United States of America  
v.  
Luis Enrique Guzman Pablo (1991/MX)

Case No. M-24-1165-M

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 19, 2024-July 11, 2024 in the county of Cameron in the  
Southern District of Texas, the defendant(s) violated:*Code Section*

18 USC § 371

*Offense Description*

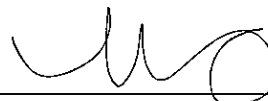
Conspiracy to defraud the United States

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Approved by: AUSA Roberto Lopez, Jr.

Submitted by reliable electronic means, sworn to  
and attested to telephonically per Fed. R. Cr. 4.1,  
and probable cause found on:Date: 07/13/2024 5:51p.m.City and state: McAllen, Texas/s/ Brian Oliveira*Complainant's signature*Brian Oliveira HSI Special Agent*Printed name and title**Judge's signature*U.S. Magistrate Judge Nadia Medrano*Printed name and title*

**Attachment "A"**

I, Brian Oliveira, am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts:

1. On May 19, 2024, a red Chevrolet Blazer, hereinafter referred to as ("BLAZER"), was reported stolen to the Brownsville Police Department. On May 19, 2024, BLAZER was crossed outbound from the United States to Mexico through Veterans International Bridge in Brownsville, Texas. BLAZER has not been recovered by law enforcement in the United States or Mexico.
2. On July 11, 2024, Luis Enrique GUZMAN Pablo was interviewed at Veterans International Bridge in Brownsville, Texas. In a post Miranda statement, GUZMAN stated he was a member of the Mexico National Guard assigned to customs in Matamoros, Mexico. GUZMAN stated his job is to inspect merchandise brought from the United States, including through the Veterans International Bridge, and taken to Mexico.
3. During an interview with law enforcement, GUZMAN stated he had previously been contacted by co-conspirators who wanted him to allow vehicles he knew to be stolen to cross from the United States into Mexico. GUZMAN agreed to assist the individuals and admitted to allowing multiple stolen vehicles enter Mexico from the Veterans International Bridge in the United States while working in customs in Mexico.
4. A photo of the BLAZER was located in GUZMAN's cellular phone. GUZMAN admitted that the BLAZER was one of the vehicles he allowed to cross into Mexico from the United States.
5. GUZMAN admitted to Customs and Border Protection officers that he was being paid to be a lookout/coordinator of stolen vehicles. Mr. Guzman stated that he knew the vehicles were stolen in the United States and that he would allow them to cross the port of entry. Mr. Guzman stated that he would coordinate with two individuals. Mr. Guzman stated that he would be paid for approximately 5-6 vehicles per night and would be paid approximately \$150 in United States currency per vehicle. GUZMAN admitted he had been conspiring with other individuals to facilitate the exportation of stolen vehicles for approximately the last two months.
6. WhatsApp records obtained by HSI show previous messages between a phone number claimed by GUZMAN in his passport application show communications between identified co-conspirators and the phone number claimed by GUZMAN advising when to cross stolen vehicles and informing said co-conspirators when and if vehicles were being inspected by Mexican customs since at least May 6, 2024.
7. During a search of the phone in GUZMAN's possession on July 11, 2024, Agents also found WhatsApp communications indicating that GUZMAN was offering to assist individuals in exporting vehicles in exchange for \$150.
8. On July 13, 2024, GUZMAN attempted to re-enter the United States through the Veterans International Bridge.